

Memorandum

Date : July 1, 2002

Telephone: (916) 657-4394

To : **Tracy Peaker Project Siting Committee:**
Robert Pernell, Presiding Member

File: S/projects/Tracy/PMPD Comment Letter.doc

From : **California Energy Commission** - Cheri Davis, Project Manager
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Subject : **Comments on the Presiding Member's Proposed Decision for the Tracy Peaker Project (01-AFC-16)**

On May 31, 2002, the Presiding Member's Proposed Decision (PMPD) for Tracy Peaker Project was released. The Notice of Availability directed interested parties, governmental agencies and members of the public to file written comments by July 1, 2002. Staff respectfully submits the following comments:

Transmission System Engineering

Until recently, CPUC Rule 21 provided interconnection standards for parallel generating stations connecting to the transmission and distribution system. CPUC Rule 21 was modified to cover only distribution facilities and therefore it no longer applies to transmission facilities. Interconnection standards to the transmission system are covered by PG&E's Interconnection Handbook and Cal-ISO standards, which are already cited in the Conditions of Certification. Therefore, all references to CPUC Rule 21 should be removed from the conditions of certification, as follows:

- Page 77, TSE-5 d): Delete "CPUC Rule 21 and."
- Page 78, TSE-5 Verification a) & b): Delete "CPUC Rule 21."
- Page 79, TSE-7, Verification, 6th line, a): Delete "CPUC Rule 21."

Air Quality

- Page 89, AIR QUALITY Table 1: the fine particulate standards (PM_{2.5}) need to be moved from the "California Standard" column to the "Federal Standard" column. This was incorrect in the Staff Assessment.
- Page 91, line three of footnote 16: please delete "federal PSD,". The footnote incorrectly states that the District has been delegated to implement the federal PSD program. The SJVUAPCD has not been delegated to implement the federal PSD program. Additionally, the Tracy Peaker Power Plant Project does not trigger PSD permitting.
- Page 93, last paragraph, second sentence, should be revised to read..."The San Joaquin Valley Air Basin is considered to be in attainment..."
- Page 94, second paragraph, first sentence, should be revised to read..."While the San Joaquin Valley Air Basin is designated attainment for the state 1-hour and for the

federal annual NO₂ standards...". The third sentence should be revised to read..."NO is oxidized in the atmosphere to NO₂ but some..."

- Staff revised the PM₁₀ cumulative modeling and performed NO₂ cumulative modeling, addressing intervenor comments, to include another nearby newly permitted source called Adesa Auto Auction. The results of the revised modeling were provided graphically at the evidentiary hearing. The following changes are recommended to update the PMPD.
 - Page 95, second paragraph second and third lines, should be revised to read..."information from the TPP, the Tesla Power Plant Project, the East Altamont Energy Center project, and the Adesa Auto Auction project, the last two which were not available..."
 - Page 100, first paragraph second sentence, should be revised to read..."Staff modeled the TPP, Tesla, East Altamont Energy Center, and Adesa Auto Auction projects PM₁₀ emissions in order to determine the PM₁₀ cumulative impacts for all four projects."
 - Page 100, footnote 18 first second line, should be revised as follows..."TPP site, or the Adesa Auto Auction site located approximately 3.5 miles west northwest of the TPP site."
 - Page 100, footnote 18, add the following sentence on at the end..."Air Quality Table 30 does not include separate results for the Adesa Auto Auction; however, the maximum total impacts include the minor PM₁₀ contributions from the Adesa Auto Auction facility."
 - Page 101, second line, delete the word "power".
- Page 96, last line: revise text to read..."The maximum duration of the initial commissioning process for each CTG is 30 days." This correction will clear up any potential misunderstanding between this sentence and the first sentence in this paragraph.
- Page 99, line 3: revise text to read..."Applicant projects a maximum 10 ppmvd ammonia slip..."
- Page 102, line three, should be revised to read..."PM₁₀ emission reduction credits be surrendered prior to the initiation of construction. Condition AQ-C4 was revised, as noted below, to only require the PM₁₀ credits to be surrendered prior to initiating construction.
- Page 102, third paragraph lines five and six, should be revised to read..."PM₁₀ emissions are limited to 10.4 pounds per hour per turbine. SO_x emission are limited to 0.78 pounds per hour per turbine and..."
- Page 103, line twelve: we suggest revising as follows..."significant amount of dilution air would be required...". Also, although staff is aware that the word "temperation" was used in the AFC, staff suggests changing this to the more recognizable word "tempering."
- Page 105: there is no specific mention of the Applicant's voluntary plan to reduce hours of operation. A mention of this voluntary plan and a reference to Condition AQ-79, should be added (see note regarding page 126 below).

- Page 107, number 11: we suggest revising as follows...“Project emissions will not results in significant adverse cumulative impacts...”
- Page 112, Condition AQ-C4 should be deleted and replaced with the following revised condition. The revised condition provided in the Staff Assessment Supplement, which was requested by the Applicant and agreed to by staff, clarifies the amount of ERCs not otherwise required in Condition AQ-62, and only requires the PM₁₀ credits to be surrendered prior to construction.

AQ-C4 The project owner shall surrender to the District emission offsets in the following amounts, in addition to those listed in Condition AQ-62, to fully mitigate project emissions:

Pollutant	Required Offsets (lbs/quarter)			
	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th Quarter
CO	35,768	35,768	35,852	35,852
PM₁₀	7,300	7,300	7,300	7,300
VOC	5,000	5,000	5,000	5,000
SO₂	2,800	2,800	2,800	2,800

This condition serves to augment the ERC requirements listed in District condition **AQ-62**, by adding the CEQA mitigation proposed by the Applicant for PM₁₀, VOC, CO and SO₂ emissions. Also, in order to provide additional mitigation of construction PM₁₀ emissions the project owner shall surrender the PM₁₀ emission offsets, required in this condition, and those required in condition AQ-62, prior to initiating construction.

Verification: At least 5 days prior to commencing construction, the project owner shall provide to the CPM a copy of the documentation from the District proving that the PM₁₀ emission offsets have been surrendered, and at least 15 days prior to initial turbine startup, the project owner shall provide to the CPM a copy of the documentation from the District proving that all of the emission offsets, as required in this condition and condition AQ-62, have been surrendered.

- Page 112, prior to AQ-1, the following text from the SA should be re-inserted:

“DISTRICT FINAL DETERMINATION OF COMPLIANCE CONDITIONS

SJVAPCD Permit No. UNIT N-4597-1-0 – 84.4 MW NOMINALLY RATED GENERAL ELECTRIC MODEL PG 7121 EA NATURAL GAS FIRED SIMPLE-CYCLE PEAK-DEMAND COMBUSTION TURBINE GENERATOR SERVED BY AN INLET AIR FILTRATION AND COOLING SYSTEM, DRY LOW-NOX COMBUSTORS, A SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH AMMONIA INJECTION, AND AN OXIDATION CATALYST.

SJVAPCD Permit No. UNIT N-4597-2-0 – 84.4 MW NOMINALLY RATED GENERAL ELECTRIC MODEL PG 7121 EA NATURAL GAS FIRED SIMPLE-CYCLE PEAK-DEMAND COMBUSTION TURBINE GENERATOR SERVED BY AN INLET AIR FILTRATION AND COOLING SYSTEM, DRY LOW-NOX

COMBUSTORS, A SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM WITH AMMONIA INJECTION, AND AN OXIDATION CATALYST.

The following Conditions of Certification apply per turbine unit unless otherwise identified."

The text describes the turbines and noting that these conditions are per turbine, unless otherwise identified, is necessary for compliance purposes.

- It has come to staff's attention based on compliance issues for the Henrietta case that two Conditions of Certification need to be added to the decision for this case. The first provides emission limits during the first few activities of the initial commissioning, the second requires the Applicant to keep the Energy Commission informed regarding proposed changes to their air permits. The higher commissioning emission limits are required for the Applicant to maintain compliance. The commissioning emission impact analysis, which found no significant impacts from commissioning was based on the worst-case commissioning emission as provided in this new condition. The Applicant has reviewed and agreed to these conditions as written below.

Additionally, it is suggested that the following text be added on page 96 at the end of the last paragraph: "Condition **AQ-C5** limits the commissioning duration and emissions, and requires that the applicant provide a monthly report to substantiate compliance with the condition."

The two additional staff conditions are provided below and should be inserted after AQ-C4 on page 112 of the PMPD.

AQ-C5 The project owner shall limit commissioning emissions, not including startup and shutdown emissions after SCR Catalyst and CEM Certification, and commissioning duration of the following commissioning activities to the following:

Initial Commissioning Activities	Firing Duration	CO	NO _x	VOC	NH ₃
	(Hours per turbine)	Lbs/hr per turbine			
First Fire	8	136	84	10	0
Full Speed, No Load Operation	12	136	84	10	0
Synchronization and Load Test	50	136	84	18	0
Turbine Optimization "Load Tests"	24	108	66	B	0
Operation with SCR Catalyst / CEM Certification	48	B	66	B	20 ^A

A – Limit provided as ppm @ 15 percent O₂ over a 24 hour rolling average.

B – Normal operating hourly emission limits as provided in condition **AQ-20** apply.

The commissioning activities occurring after the "Operation with SCR Catalyst / CEM Certification" activity (i.e. Final Plant Tuning, Performance Test, and Reliability Run activities) are required to meet the emission limits provided in conditions **AQ-20** and **AQ-24**.

Initial commissioning emissions shall accrue towards the quarterly and annual emission limits provided in conditions **AQ-23**, respectively.

Verification: The project owner shall submit, commencing one month from the time of gas turbine first fire, a monthly commissioning status report throughout the duration of the commissioning phase that demonstrates compliance with the duration and emission limit requirements of this condition. The monthly commissioning status report shall include CO and NO_x CEM data, and the duration and criteria pollutant emission estimates for each commissioning activity and total commissioning emission estimates. VOC and NH₃ emissions during commissioning shall be based on CPM approved emission factors and calculation methodology. The monthly commissioning status report shall be submitted to the CPM until the report includes the completion of the initial commissioning activities. The firing duration limits provided in this condition may be increased upon CPM approval.

AQ-C6 The project owner shall submit to the CPM for review and approval any modification proposed by either the project owner or issuing agency to any project air permit.

Verification: The project owner shall submit the proposed air permit modification to the CPM within five (5) working days of its submittal by the project owner to an agency or receipt of proposed modifications from an agency. The project owner shall submit all modified air permits to the CPM within fifteen (15) days of their receipt.

- Page 113, line 2 of the Verification of Condition AQ-4, should be revised, as provided in the Staff Assessment Supplement, as follows..."compliance as part of the annual reports of AQ-29.
- Page 126: the Applicant's voluntary plan for a reduction in hours should be separated from AQ-78 and renumbered as AQ-79. It is a separate voluntary plan with a separate protocol and verification and therefore should be a separately numbered condition.

Public Health

- Page 132, Table 2: change 1.0×10^{-5} to 10.0×10^{-6}

Hazardous Materials

- Page 141, paragraph 3, line 3: Change "hydroxide" to "sodium hydroxide."
- Page 143, paragraph 2, line 9: At the evidentiary hearing, staff raised the issue of the safety of the double-walled aqueous ammonia storage tank in the event of an intentional act of sabotage. The applicant proposed to place a berm or wall around the storage tank and connect the area to the underground spill containment tank located under the aqueous ammonia delivery truck pad. This underground tank would also be sized appropriately to collect the volume of the spilled liquid from the storage tank. Staff agreed that this would be adequate mitigation should an intentional act of sabotage pierce both walls of the storage tank. While no specific language was offered during the course of the hearings, staff believes that the following accurately

characterizes the measures discussed in the hearings. Therefore, staff suggests adding the following after the parenthetical phrase ending with 8.12.3.3:

“In addition, to protect against the spread of vapors during an intentional act of sabotage as well as an accidental release, the applicant will construct a containment berm around the double-walled aqueous ammonia tanks. This bermed area will also drain to the underground containment structure located beneath the truck loading pad.”

- Page 145
 - 1st Finding, line 3: Change “hydroxide” to “sodium hydroxide.”
 - HAZ-2 Verification: Amend the verification to read “At least 30 days prior to the commencement of construction of the hazardous materials storage and containment facilities...”
- Page 146, HAZ-4, 3rd line:
 - Change “Patterson Pass Road” to “Mountain House Parkway.”
 - In further support of the changes to the ammonia containment structures described above, delete the words “the delivery area” up to and including “plus wash water,” and replace with the following:

“the tanks and delivery area shall be protected by a secondary containment berm or wall which shall drain to a below ground containment structure capable of containing the entire contents of the tank plus 125% of a the worst case 24-hour rainfall,” and then continue with “the ammonia pump station...”

Biological Resources

- Page 159, Table 2: Table 2 is from Staff's original testimony, which was revised in the January 2002 Staff Assessment Supplement. Staff suggests replacing Table 2 in the PMPD with the following updated table:

Biological Resources Table 2
Estimates of Temporary and Permanent Habitat Losses
 (GWF 2001**bc**)

Project Feature	Temporary Disturbance (Acres)	Permanent Disturbance (Acres)
Access Road	1.5	1.9
Temporary Access Road	1.9	0.0
Water Supply Line	0.6	0.0
Power Plant Fenced Area	0.0	9.0*
PG&E Switchyard Fenced Area	0.0	1.3
Construction laydown/Parking	5.2 18.4	0.0
Total	7.3 22.4	12.2

*Includes the GWF switchyard

- Page 164, Item 1, Findings and Conclusions: The summary statement that “No special status species exist on the project site” is contradicted by staff’s testimony that foraging and migration by such species may occur, and that special status species could move onto the site at any time. In addition, such a statement weakens Staff’s request for mitigation to lessen impacts (Conditions of Certification BIO-6 and BIO-7). Therefore, it would be more accurate to use the following wording:

“No special status species exist on the project site were identified during surveys of the project site and linear facilities.”

- Page 164, Item 3: Staff suggests that summary statement 3 be changed to read:
“Project specific direct impacts will result in the permanent loss of 12.2 acres and the temporary loss of 22.4 acres of sensitive open space habitat for the San Joaquin kit fox and other sensitive species in the region.”
- Page 168, BIO-5: The Compliance Unit and the technical staff suggest the following revision of BIO-5 to be consistent with current standard conditions:

BIO-5 The project owner shall submit to the CPM for review and approval a copy of the final Biological Resources Mitigation Implementation and Monitoring Plan (BRMIMP) and shall implement the measures identified in the plan. ~~Any changes to the adopted BRMIMP must be made by the Energy Commission staff, in consultation with SJCOG, Inc.~~

A similar sentence should be added to the end of the verification for BIO-5 as follows:

Any changes to the approved BRMIMP must be approved by the CPM in consultation with SJCOG, Inc. and appropriate agencies to ensure no conflicts exist.

- Page 169: Staff suggests removal of the header “Verification” from the second paragraph. This paragraph is part of the verification for Condition of Certification BIO-5.
- Page 170, BIO-6: The USFWS was inadvertently left out of this condition. Upon review of this measure with USFWS, they also requested a 24-hour notice and a follow up consultation for any inadvertent deaths. Staff therefore requests the following changes to item 12 of this measure:

12. Report all inadvertent deaths of sensitive species to the appropriate project representative within 24-hours and have a consultation with the CPM, SJCOG, and other appropriate agencies within two weeks of the event. Injured animals will be reported to the USFWS and/or CDFG, and the project owner will follow the instructions that are provided by USFWS and/or CDFG.

- Page 170, BIO-7: To allow staff greater flexibility in responding to a dynamic construction schedule, staff requests changes to BIO-7 and its verification as follows:

BIO-7 ~~Thirty days prior~~ Prior to the beginning of site mobilization, the project site, the laydown and parking area, the permanent road improvement, the temporary access road, and water pipeline route must be surveyed by a qualified biologist in accordance with USFWS and CDFG protocols for San Joaquin kit fox, Western burrowing owl, and other sensitive species listed in Table 1.

Verification: Surveys by a qualified biologist shall be conducted thirty (30) days prior to site or related facility mobilization. Two weeks prior to site or related facility mobilization, the Designated Biologist will submit to the CPM a report detailing the methodology and results of the surveys for approval.

- Page 170, BIO-9: The acreage listed in this condition is inconsistent with the acreage described on page 159. The amount of temporary and permanent impact throughout staff's supplemental testimony (as revised in January 2002) and the PMPD is 34.6 acres (see page 159). The PMPD's Condition of Certification BIO-9 specifies only 19.5 acres. Staff suggest the first line of text be changed to:

"The applicant will purchase habitat credits from the San Joaquin Council of Governments, Inc. that meet or exceed the 34.6 acres...."

- Page 171, BIO-10 and BIO-11: The USFWS and the San Joaquin Kit Fox Planning and Conservation Team had concerns regarding the kit foxes along the Delta Mendota canal and Union Pacific railroad. Staff worked with the applicant and USFWS to find a resolution to the issue, and proposed a revised Condition of Certification BIO-10 and a new Condition of Certification BIO-11 in the Staff Assessment Supplement released January, 2002. While the PMPD recognizes staff's measures in the text (pages 158 and 159), they were not included as Conditions of Certification. In addition, conversations with USFWS and SJCOG since the release of the BRMIMP identified a gap in the monitoring of the fence surrounding the plant. In order to make the PMPD consistent with the Staff Assessment Supplement and to address the concerns raised by USFWS and SJCOG, staff requests that the following changes to Condition of Certification BIO-10 and the re-insertion of BIO-11.

BIO-10 The TPP site and worker parking and staging areas shall be fenced in a manner to exclude moderately small mammals (2 to 10 pounds). The design shall be incorporated into the BRMIMP. The fence around the construction site should be patrolled daily by on-site staff prior to the start of each days construction activities. The Designated Biologist must be on-site during all construction activities if a suitable fence design cannot be installed. The permanent fence for the TPP should be capable of excluding moderately small mammals and be placed as far as feasible from the Delta Mendota Canal and the Union Pacific Railroad. Where fencing cannot be located outside of the 300-foot buffer from the Delta Mendota canal's water edge, the interior areas will be considered a loss to a kit fox corridor and a conservation easement on GWF's lands should be established at a 1:1 (impact:mitigation) ratio. The permanent fence around the TPP site shall be inspected by on-site staff monthly, and by the Designated Biologist during their visits, and repairs made within one week of identifying a problem.

Verification: The fence design will be incorporated into the final BRMIMP. The BRMIMP shall be submitted to the CPM for approval at least 60 days prior to start of any site or related facility mobilization activities. If the CPM determines the fence cannot exclude small mammals including the San Joaquin kit fox, a designated biologist will remain onsite during all construction activities. During operations, the

Designated Biologist shall describe the fence's condition in the Annual Compliance Report.

BIO-11 The Landscaping Plan plant list shall be limited to species that do not provide abundant nesting habitat or perch points for raptors. Along the Delta Mendota canal side (southwest side) of the site, the use of trees shall be avoided and shrubs shall be either close to the facility's fenceline or widely scattered. The north, east and south sides of the site may be planted with a narrow (<100 foot) band of trees. The western and northwestern sides may be planted with a narrow band of moderately sized (<50 foot tall) native trees or shrubs. All areas that cannot be landscaped to resemble annual grasslands or valley oak woodland will be considered a loss of open space and habitat credits from the San Joaquin Council of Governments, Inc. shall be purchased (see Biological Resources Condition of Certification BIO-9). The Landscape Plan shall be made part of the BRMIMP.

Verification: The Landscaping Plan shall be appended to the final BRMIMP and shall be submitted to the CPM for approval at least 60 days after the start of any site or related facility mobilization activities. If necessary, provide a copy of the check issued to San Joaquin Council of Governments, Inc., verifying funds have been paid.

Soil and Water Resources

- Page 173, second paragraph, second to last sentence: Change “site grading and drainage plans” to “Erosion Control Plan.”
- Page 181, SOIL & WATER 3, line 2: Change “approval or” to “approval of.”
- Page 182, SOIL & WATER 4: After internal discussions, staff believes the condition is redundant with a Facility Design condition and would be most appropriately addressed by the CBO during construction of the project. Installation of the septic system would remain consistent with LORS after review by the CBO. Therefore, we recommend the condition be dropped from the PMPD.

Cultural Resources

- Page 189: the fourth item in verification for condition **CUL-1** has a duplicate “verification” heading. This should be removed.
- Page 190:
 - remove “Protocol” from before the first full paragraph and change “(1)” to “(2).”
 - change “(2)” to “(3)” before the second paragraph.
 - change “(3)” to “(4)” before the third paragraph.
- Page 191:
 - remove “Protocol” heading in the second paragraph of Cul-4.
 - insert (1) between **CUL-5** and the start of the paragraph.
- Page 192:
 - remove “Protocol” from first paragraph and change “(1)” to “(2).”
 - change “(2)” to “(3)” before the second paragraph.

- change “(3)” to “(4)” before the third paragraph.
- change “(4)” to “(5)” before the fourth paragraph.

Geology and Paleontology

- Page 195:
 - Geology and Paleontology (Paragraph 1, line 7): Strike “, and surface water hydrology.”
 - Summary and Discussion of the Evidence (Paragraph 2, Line 3): Replace: “high” with “highly.”
- Page 196:
 - Potential for Seismic Events (Paragraph 1, Line 4): Strike the sentence beginning with “However, neither....” This sentence is redundant.
 - Potential for Seismic Events (Paragraph 1, Line 8): Insert “or linear facilities” after “...power plant footprint.”
 - Potential for Seismic Events (Paragraph 1, Line 11): Strike: “extremely.”
- General comment on the conditions of certification: Staff recommends deleting the GEN and CIV conditions in this section, because they are also included in the FACILITY DESIGN section.

Land Use

- Page 208, first paragraph, fourth and fifth sentences: The PMPD states that the industrial uses, which are actually immediately adjacent to the proposed site are within one mile. Although this statement is not incorrect, it may lead the reader to believe that they are farther away from the site. The fourth and fifth sentences should be revised to read as follows:

~~“Immediately T~~to the north ~~within one mile~~ of the site are the Owens-Brockway Glass Container manufacturing plant, ~~and the Nutting-Rice warehouse, and T~~the Tracy Biomass Power Pant ~~is approximately 0.6 miles to the northwest.”~~
- Page 213, first sentence under Item 3: one of the intervenors’ last names is left out. The first sentence should be revised to read as follows:

“Intervenors Robert Sarvey, City of Tracy, Charles Tusso, Larry Cheng and Irene Sundberg (collectively Intervenors) contend...”
- Page 223 & 224, LAND-2: The condition in the PMPD, which appears to have come from the original Staff Assessment, was modified in the Supplement to the Staff Assessment filed in January, 2002. To make the condition consistent with the Supplement to the Staff Assessment, staff suggests replacing LAND-2 in the PMPD with the following:

LAND-2 To compensate for prime farmland land conversion impacts (i.e., the conversion of 10.3 acres of a 40 acre parcel), the project owner will provide \$56,500 to the American Farmland Trust (AFT) to establish the Tracy Peaker Project Trust Fund. The AFT and the San Joaquin County Planning

Director, in conjunction with the California Energy Commission Compliance Manager (CPM) will decide how the funds will be disbursed for the protection of farmland in San Joaquin County.

In addition, the project owner shall develop for the approval of the Energy Commission CPM an agricultural mitigation plan describing long-term management of the remaining agricultural operation on the property. The mitigation plan shall include on-site preservation of any agricultural land on the property not converted for the power generation facility and details as to how the agricultural land on the subject property that is not converted for the power generation facility (i.e., approximately the remaining 29.7 acres of the proposed site parcel) is to be made available for farming.

The AFT would hold the mitigation fee in trust, in an interest bearing account, for a three-year period to allow San Joaquin County to develop a mitigation program for the loss of agricultural land, through purchase of conservation easements. At the end of the three years, the AFT shall distribute the funds to San Joaquin County, or in the event that San Joaquin County has not approved a program for the loss of agricultural land, then the AFT shall be allowed to retain the funds.

Protocol: The project owner shall submit the mitigation plan for the project to the Director of the San Joaquin County Planning Department for review and comment and the CPM for review and approval. The Director will have 30 calendar days to review and provide written comments to the CPM to review for approval. The 30-day review period shall begin the day the mitigation plan is submitted to the County Planning Department by the project owner.

Verification: Sixty (60) days prior to the start of site mobilization, the project owner shall provide a certified check to the AFT for \$56,500 and written verification to the CPM that the check has been provided to the AFT. The project owner shall also provide the CPM with the final agricultural mitigation plan.

The project owner shall provide to the CPM in a monthly compliance report a copy of the executed agricultural conservation easements.

Visual Resources

- Page 241, "Methodology," fourth bullet, line 2: "KPO 6" should be changed to "KOP 6."
- Page 245, line 8: "moderate" should be changed to "moderately low."
- Page 247, second paragraph, line 12: "constrains" should be changed to "constraints."

cc: Tracy Peaker Project POS list